

PROJECT NO. 38257

RULEMAKING RELATING TO	§	PUBLIC UTILITY COMMISSION
	§	
VEGETATION MANAGEMENT	§	OF TEXAS

Introduction

The staff of the Public Utility Commission of Texas request comments on the following strawman for new PUC SUBST. R. 25.96, relating to vegetation management. Project No. 38257 has been assigned to this proceeding.

The proposed rule would establish parameters for the Vegetation Management Plan and submission of the Plan Report mandated by §§25.94 and 25.95. The rule also requires utility conformance with industry standards.

The staff invites comments on the draft rule. These comments will be useful in developing a proposed rule expected to be issued in a formal comment period in summer 2012. Comments on the draft rule (10 copies) may be submitted to the Filing Clerk, Public Utility Commission of Texas, 1701 North Congress Avenue, PO Box 13326, Austin, Texas 78711-3326, before 3 p.m. on April 18, 2012.

Comments should be organized in a manner consistent with the organization of the draft rule. In addition to commenting on the strawman rule, please provide responses to the following question:

- 1) Do any other terms need to be defined? If so, please state the terms, provide definitions for them, and cite your sources for the definitions.

All comments should refer to Project Number 38257.

Questions concerning the comments or this notice should be referred to Jennifer Hubbs, Infrastructure & Reliability Division, (512) 936-7233 or jennifer.hubbs@puc.state.tx.us.

§25.96 Vegetation Management.

- (a) **Application.** Subsections (a)-(f) of this section apply to the distribution assets of each electric utility (utility). Subsection (g) of this section applies to the distribution assets of each electric cooperative (cooperative).
- (b) **Definitions.** The following terms when used in this section shall have the following meaning, unless the context indicates otherwise.
 - (1) **Right-of-way** – a corridor of land over which electric lines are located and in which the utility or cooperative has the right to manage vegetation.
- (c) **Filing requirements.** Filings made under this section satisfy the vegetation management reporting requirements of §25.94(c)(2) (relating to Report on Infrastructure Improvement and Maintenance) and §25.95(e)(2) (relating to Electric Utility Infrastructure Storm Hardening).
- (d) **Utility Conformance to Standards of the Industry.**
 - (1) A utility shall make reasonable efforts to conform to the following standards, where applicable:
 - (A) American National Standards Institute (ANSI) Standard Z133.1, *Arboricultural Operations – Pruning*, or successor standard;
 - (B) ANSI Standard A300 (Part 1) – *Tree, Shrub, and Other Woody Plant Management – Standard Practices (Pruning)*; (Part 7) – *Integrated Vegetation Management a. Utility Rights-of-way practices*; and (Part 9) – *Tree Risk Assessment a. Tree Structure Assessment*; or successor standards; and
 - (C) National Electric Safety Code Section 218, or successor standard.
 - (2) For any standard specified in paragraph (1) of this subsection to which a utility does not substantially conform, the utility shall provide an explanation for the deviation in its Vegetation Management Report.

(e) **Vegetation Management Plan.** Each utility shall maintain a Vegetation Management Plan (Plan) that describes the utility's objectives, practices, procedures, and work specifications. A full copy of the Plan shall be provided to the commission or commission staff within ten days of receipt of the request. A utility shall review and update its Plan by May 1 of each year. The Plan shall include, at a minimum, a description of the utility's:

- (1) tree pruning methodology, trimming clearances, and scheduling approach;
- (2) vegetation control measures used around applicable distribution assets, excluding service drops;
- (3) tree risk management program;
- (4) participation in continuing education for vegetation management personnel;
- (5) estimate of circuits to be trimmed or method for planning work for the coming year;
- (6) plan to remediate the worst ten percent of feeders system-wide according to the preceding year's vegetation-specific System Average Interruption Duration Index (SAIDI) and System Average Interruption Frequency Index (SAIFI) scores; and
- (7) customer education, notification, and outreach practices related to vegetation management.

(f) **Vegetation Management Report.** A utility shall file with the commission by May 1 of each year a Vegetation Management Report (Report) summarizing its Vegetation Management Plan and its progress in implementing its Plan for the preceding year. The Report filed in 2013 does not need to contain the information required by paragraph (2) of this subsection. The Report shall include, at a minimum, the following components:

- (1) A Vegetation Management Plan summary including, at a minimum, a summary of the utility's:

- (A) vegetation maintenance goals and the method the utility employs to measure progress;
 - (B) trimming clearances and scheduling approach;
 - (C) plan to remediate the worst ten percent of feeders system-wide according to the preceding year's vegetation-specific SAIDI and SAIFI scores;
 - (D) tree risk management program;
 - (E) method for monitoring, preparing for, and responding to adverse environmental conditions such as drought and wildfire danger;
 - (F) total overhead distribution miles in its system, excluding service drops;
 - (G) total number of customers served;
 - (H) the amount of vegetation-related work it plans to accomplish next year to achieve its vegetation management goals described in subparagraph (A) of this paragraph; and
 - (I) vegetation management budget, divided into the following categories. The utility shall assign subcategories reflecting its budgetary practices and list them under these categories. The utility shall state the dates the budget covers and provide totals for each category and subcategory.
 - (i) Scheduled vegetation maintenance;
 - (ii) Priority vegetation maintenance;
 - (iii) Tree risk management program; and
 - (iv) Emergency/post-storm activities.
- (2) An implementation summary for the preceding year including, at a minimum, a description of:

- (A) whether the utility met its vegetation maintenance goals and how its goals have changed for the coming year based on the results;
- (B) successes and challenges with the utility's strategy;
- (C) the total number of outages caused by fallen trees, divided into those falling from:
 - (i) outside the right-of-way; and
 - (ii) inside the right-of-way;
- (D) the number of continuing education hours logged for vegetation management personnel;
- (E) the amount of vegetation management work the utility accomplished to achieve its vegetation management goals described in paragraph (1)(A) of this subsection;
- (F) the separate SAIDI and SAIFI scores for vegetation-caused outages;
- (G) the vegetation management budget, including, at a minimum:
 - (i) a single table with columns representing:
 - (I) the budget for each category and subcategory that the utility provided in the preceding year pursuant to paragraph (1)(I) of this subsection, with totals for each category and subcategory ;
 - (II) the actual expenditures for each category and subcategory listed pursuant to clause (i)(I) of this subparagraph, with totals for each category and subcategory ; and

(III) the percentage of actual expenditures over or above the budget for each category and subcategory listed pursuant to clause (i)(I) of this subparagraph;

(ii) an explanation of the variation from the preceding year's vegetation management budget where actual expenditures in any category or subcategory fell below 90 percent or increased above 110 percent of the budget for that category;

(iii) the total vegetation management expenditures divided by the number of overhead distribution miles in the utility's system, excluding service drops; and

(iv) the total vegetation management expenditures divided by the number of customers the utility served.

(g) **Electric cooperatives.**

(1) **Application.** This subsection applies to the distribution assets of cooperatives.

(2) **Vegetation Management Plan.** A cooperative shall maintain a Vegetation Management Plan (Plan). A full copy of the Plan shall be provided to the commission or commission staff within ten days of receipt of the request.

(3) **Vegetation Management Report.** A cooperative shall file with the commission by May 1 of each year a Vegetation Management Report (Report) summarizing its Vegetation Management Plan and its progress in implementing its Plan for the preceding year. The Report filed in 2013 does not need to contain the information required by subparagraph (B) of this paragraph. The Report shall include, at a minimum, the following components:

(A) A Vegetation Management Plan summary including, at a minimum, a descriptive summary of the cooperative's:

- (i) vegetation maintenance goals and the method the cooperative employs to measure progress;
- (ii) trimming clearances and scheduling approach;
- (iii) tree risk management program;
- (iv) method for monitoring, preparing for, and responding to adverse environmental conditions such as drought and wildfire danger;
- (v) total overhead distribution miles in its system, excluding service drops;
- (vi) total number of customers served;
- (vii) amount of vegetation-related work it plans to accomplish next year to achieve its vegetation management goals described in clause (i) of this subparagraph; and
- (viii) vegetation management budget, divided into the following categories. The cooperative shall assign subcategories reflecting its budgetary practices and list them under these categories. The cooperative shall state the dates the budget covers and provide totals for each category and subcategory .

(I) Scheduled vegetation maintenance;

(II) Priority vegetation maintenance;

(III) Tree risk management program; and

(IV) Emergency/post-storm activities.

- (B) An implementation summary for the preceding year including, at a minimum, a description of:

- (i) whether the cooperative met its vegetation maintenance goals and how its goals have changed for next year based on the results;
- (ii) successes and challenges with the cooperative's strategy;
- (iii) the total number of fallen tree-caused outages, divided by those falling from:
 - (I) outside the right-of-way and
 - (II) inside the right-of-way;
- (iv) the number of continuing education hours logged for vegetation management personnel;
- (v) the amount of vegetation management work the cooperative accomplished to achieve its vegetation management goals described in subparagraph (A)(i) of this paragraph;
- (vi) the vegetation management budget including, at a minimum:
 - (I) a single table with columns representing:
 - (-a-) the preceding year's budget for each category and subcategory that the cooperative provided in the preceding year pursuant to subparagraph (A)(viii) of this paragraph, with totals for each category and subcategory ;
 - (-b-) the actual expenditures for each category and subcategory listed pursuant to item (-a-) of this paragraph, with totals for each category and subcategory; and

- (-c-) the percentage of actual expenditures over or above the budget for each category and subcategory listed pursuant to item (-a-) of this subclause;
- (II) an explanation of the variation from the preceding year's vegetation management budget where actual expenditures in any category or subcategory fell below 90 percent or increased above 110 percent of the budget for that category;
- (III) the total vegetation management expenditures divided by the number of overhead distribution miles in the cooperative's system, excluding service drops; and
- (IV) the total vegetation management expenditures divided by the number of customers the cooperative served.